

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

FILED
RICHARD W. HAGEL
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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION DAYTON

UNITED STATES OF AMERICA, : Case No. **3 22 cr 0W20**
Plaintiff, :
v. : I N D I C T M E N T
: 21 U.S.C. § 841(a)(1)
: 21 U.S.C. § 846
: FORFEITURE
1. ANTHONY CURLETT : **THOMAS M. ROSE**
2. BRITTAN GIBSON :
3. RONNIE BAILEY :
Defendants. :

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 846 and 841(b)(1)(A)]

Between a beginning date unknown, but at least by in or around January 2020, and in or around May 2021, in the Southern District of Ohio, and elsewhere, defendants **ANTHONY CURLETT, BRITTAN GIBSON, AND RONNIE BAILEY** knowingly and intentionally conspired to possess with intent to distribute and to distribute 500 grams or more of a mixture or substance containing a

detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT TWO

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]

On or about July 16, 2020, in the Southern District of Ohio, defendant **ANTHONY CURLETT** knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT THREE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)]

On or about March 3, 2021, in the Southern District of Ohio, defendant **BRITTAN GIBSON** knowingly and intentionally distributed 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)]

On or about March 16, 2021, in the Southern District of Ohio, defendant **BRITTAN GIBSON** knowingly and intentionally distributed 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]

On or about May 26, 2021, in the Southern District of Ohio, defendant **RONNIE BAILEY** knowingly and intentionally distributed 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses set forth in Counts One and/or Two of this Indictment, defendants **ANTHONY CURLETT, BRITTAN GIBSON, AND RONNIE BAILEY** shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s), and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation(s), including but is not limited to the following:

- \$7,500.00 in U.S. Currency;
- \$62,000.00 in U.S. Currency;

- Glock 23 .40 cal. pistol, Serial No. GYB612 with 1 .40 cal. magazine and 22 rounds of .40 cal. ammunition; and
- SKS 7.62x39mm pistol, Serial No. 1979KE381 with 1 7.62x39mm magazine and 7 rounds of ammunition.

SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants, up to the value of the forfeitable property.

A TRUE BILL

ISI
Foreperson

KENNETH L. PARKER
United States Attorney

Brent G. Tabacchi
BRENT G. TABACCHI
Assistant United States Attorney